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2003-16685-27

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A&C-FAA-04-208

Docket Management Facility
U.S. Department of Transportation
400 Seventh Street, SW
Nassif Building – Room PL 401
Washington, DC 20590-001

FAA - 2003-16685-27

Subject : FAA Docket No. FAA-2003-16685 ; Notice No. 03-13 - Establishment of
Organizational Designation Authorization Procedures

Dear Sirs,

Gulfstream clearly supports the Organization Delegation Authorization (ODA) NPRM and believes that the ODA rule will represent an important enhancement for both the FAA and industry. As a general note, the proposed ODA principles use several elements of the current FAA Order 8100.9 which has already been the basis used to develop our current DAS Procedures Manual. In order to clarify certain elements associated with this rule we would like to offer the following specific comments which if incorporated would benefit its application and utilization.

Specific Comments:

Gulfstream offers the following specific comments to the NPRM that we believe should be addressed to ensure successful incorporation and application of the final ODA rule:

Section 183.45 (a) - The rule indicates that the letter of designation will include an expiration date. ODA letters of designation should be allowed to remain in effect until surrendered by the applicant or revoked by the FAA. Application of an expiration date will clearly create a significant workload for the FAA in renewing these designations and will cause unnecessary FAA resources to be expended on designations which continue to operate effectively. There is also no mention of an expiration date in the pre-amble of the NPRM.

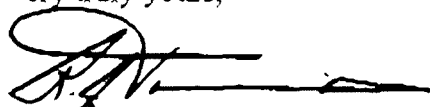
Section 183.47 – As currently defined, the rule addresses that only applicants with facilities in the United States will be eligible to be issued an ODA. Our industry is becoming more and more global and already greatly relies on suppliers outside of the US. There clearly should be rule provisions to allow the FAA to issue an ODA to a foreign entity that is aligned with organizations holding ODA authorization.

Section 183.51 - The pre-amble materials regarding personnel indicate that the ODA unit personnel would have meet the same qualification requirements as a DER. It should be noted herein or clearly understood throughout these documents that since a DAS appointed AR's qualification requirements are the same as a DER's, the terms DER or DAS AR should be considered to be equivalent. Noting this equivalency would allow an easier transition for DAS ARs to their respective ODA appointments.

Section 183.55 - The pre-amble discussion of this section expresses the need for the FAA to continue to approve the individual designees in a manner consistent to what is done today for the DOA, DAS and SFAR-36. The ODA proposed rule should develop/define the requirements for an organizational delegation and use a systems approach for the appointment of designees rather than one which based on the individual designations within the delegated organization. This type of systems approach would still entail an appointment process that is subject to FAA approval yet provide for a more effective means to control the designations under an ODA. We are aware that the ARAC WG recommended in their draft ODA Order to the FAA that the approved Procedure Manual (PM) would define the qualification of the Authorized Representatives (AR) and that the PM would also define the selection process. FAA oversight should focus on compliance with the process and not focus on the individuals. If the FAA does intend to eventually transition to a systems approach for designee appointments, then it must be clearly stated in the preamble and the criteria to enable such a process established. We believe the preamble should state that a transition plan should be included in the respective PM which provides initially for FAA retained oversight of individual appointments until the FAA gains comfort with the applicant's application of their approved process and then allows for a systems type approach process which is only overseen by the FAA for all appointments.

Should you have any further questions or need any clarification regarding this submittal, please do not hesitate to contact me at (912) 963-6536.

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. Trusis', with a long horizontal flourish extending to the right.

Richard J. Trusis, Director
Airworthiness & Certification
and Data Management